

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**MONTESSORI CHILDREN'S
HOUSE AND SCHOOL**
Plaintiff,

v.

**PHILADELPHIA INDEMNITY
INSURANCE COMPANY**
Defendant.

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CIVIL ACTION NO. 3:21-CV-01984

**PLAINTIFFS' UNOPPOSED MOTION
TO PROCEED WITHOUT LOCAL COUNSEL**

COMES NOW, Plaintiff, Montessori Children's House and School files this Unopposed Motion to Proceed Without Local Counsel, and would respectfully show unto the court as follows:

1. Local Rule 83.10(a) provides that attorneys desiring to proceed without local counsel must obtain leave of court.
2. The undersigned has been practicing for twenty-nine years and is licensed in Texas, Oklahoma, and Colorado, as well as the Northern, Southern, Eastern, and Western Districts of Texas, the Fifth Circuit Court of Appeals, and United States District Court for the District of Colorado and the Western District of Oklahoma.
3. The undersigned and this firm handle many cases in the Dallas/Fort Worth area.
4. The above facts indicate that the undersigned has experience practicing law in federal courts in all of the Texas districts, as well as Colorado and Oklahoma. The undersigned can easily travel to Dallas to attend morning and afternoon hearings in this court on short

notice. With the advent of Zoom hearings, depositions and mediations in the wake of Covid-19 the need to travel for any case has become quite less. Nevertheless, the undersigned handles numerous cases in the Dallas area and travel to Dallas for this case would not overly burden the costs to this Plaintiff.

5. From the standpoint of public policy and judicial economy, Plaintiffs in this case, like most of the clients of the undersigned, are insureds who have had a catastrophic loss claim denied by their insurance carrier. They have already had to go to the expense to hire the undersigned to handle their case. Requiring them to hire another local lawyer would add to the costs of the case for Plaintiff, which seems somewhat unfair and also make the case more difficult to resolve. The higher the Plaintiff's expenses in a case the more difficult it is to settle pre-trial. Therefore, in equity, Plaintiff begs for leave not to have to hire local counsel.

WHEREFORE, Plaintiffs respectfully requests that this Honorable Court grant their Motion for Leave for Plaintiff's Counsel to Proceed Without Local Counsel and for such other and further relief to which Plaintiff may be entitled, but in equity and at law.

CHAD T WILSON LAW FIRM PLLC

By: /s/ Patrick C. McGinnis

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF CONFERENCE

This is to certify that on August 30, 2021, Plaintiff's counsel conferred with counsel for the Defendant, and counsel for Defendant does not oppose this motion.

/s/ Patrick C. McGinnis
Patrick C. McGinnis

CERTIFICATE OF SERVICE

I certify that a true and correct copy of *Plaintiffs' Unopposed Motion for Leave for Plaintiffs' Counsel to Proceed Without Local Counsel* has been sent to counsel of record by certified U.S. Mail, facsimile, hand delivery, or electronic service on this 30th day of August, 2021.

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